

EXHIBIT B

**KIRSTEN MESSMER V. DONNIE HARRISON, ET AL.
EDNC CIVIL ACTION NO. 5:15-cv-00097-BO**

ITEMIZED SERVICES BILL

DATE	ATTY	DESCRIPTION	HOURS
03/04/15	CRW	Meeting with K. Messmer to discuss facts of the case and plan for proceeding with suit; travel to/from meeting.	1.00
03/06/15	CRW	Telephone call from K. Messmer.	0.10
03/07/15	CRW	Drafted Complaint.	1.50
03/07/15	CRW	Began drafting declaration in support of Motion for Preliminary Injunction.	0.30
03/07/15	CRW	Drafted Memorandum in Support of Motion for Preliminary Injunction.	1.70
03/08/15	CRW	Communication with team regarding filing of Complaint and Motion for Preliminary Injunction.	0.20
03/08/15	CRW	Completed draft of Messmer declaration and emailed client regarding same.	0.70
03/09/15	CRW	Reviewed and responded to correspondence from client regarding declaration and upcoming proceedings.	0.30
03/09/15	CRW	Revised Complaint.	1.00
03/09/15	CRW	Revised Memorandum in Support of Motion for Preliminary Injunction.	1.80
03/09/15	CRW	Additional follow up with client regarding declaration.	0.30
03/09/15	CRW	Revised and finalized Motion for Preliminary	0.40
03/09/15	LMK	Review Complaint and prepare summonses and civil cover sheet.	0.90
03/10/15	CRW	Reviewed all pleadings, revised same, and discussed same with E. Stone.	1.70
03/10/15	CRW	Reviewed finalized Complaint and Summons.	0.60
03/10/15	CRW	Correspondence with client regarding filings.	0.30
03/10/15	CRW	Final review of Motion for Preliminary Injunction and Memorandum in Support, finalized same.	0.90
03/10/15	ECS	Review and revise Complaint, Motion for Preliminary Injunction, and supporting Memorandum; communicate with C. Webb regarding the same.	1.50
03/10/15	LMK	Revise and file all initial case pleadings and motion and brief in support of Motion for Preliminary Injunction.	3.50
03/10/15	CVL	Research regarding Motion for Preliminary Injunction - KeyCite and QuoteCheck on Memo; also found WL cites and pulled 3 cases with Lexis cites and ran KeyCite and Quote Check on them.	0.80
03/11/15	CRW	Attention to filing of Notice of Appearance and financial disclosure.	0.20

DATE	ATTY	DESCRIPTION	HOURS
03/11/15	LMK	Prepare and file Notice of Appearance and financial disclosure; prepare letter to forward with Complaint.	0.80
03/12/15	CRW	Attention to service of process, reviewed and signed letter, and correspondence to client regarding same.	0.30
03/12/15	LMK	Prepare letter and serve initial case pleadings on defendants.	1.00
03/13/15	CRW	Telephone conference with H. Askins regarding Motion for Preliminary Injunction.	0.10
03/15/15	CRW	Correspondence to NC DOJ regarding new filing and motion.	0.10
03/23/15	CRW	Reviewed service of process dates and upcoming deadlines.	0.20
03/25/15	CRW	Received notice of hearing, communications to client regarding same, and worked on planning for hearing.	0.50
03/25/15	LMK	Docket court hearing.	0.10
03/26/15	CRW	Reviewed/finalized Affidavit of Service.	0.20
03/26/15	CRW	Telephone conference with K. Messmer regarding upcoming hearing.	0.30
03/26/15	CRW	Telephone conference with opposing counsel regarding Sheriff's request for dismissal.	0.20
03/26/15	CRW	Reviewed applicable case law regarding award of fees under 42 USC 1988 and drafted letter to N. Ellis regarding same.	0.80
03/26/15	LMK	Prepare Affidavits of Service.	0.70
03/26/15	LMK	Strategy session with C. Webb regarding upcoming hearing.	0.10
03/27/15	CRW	Reviewed letter from N. Ellis and finalized response letter; follow up correspondence with D. Erteshik.	0.50
03/27/15	LMK	Revise and file Affidavits of Service.	0.80
03/30/15	CRW	Reviewed correspondence from client.	0.10
04/02/15	LMK	Docket management regarding upcoming deadlines.	0.10
04/07/15	CRW	Worked on preparation for upcoming hearing.	0.50
04/07/15	LMK	Analysis of briefs in preparation for upcoming hearing.	0.60
04/08/15	CRW	Continued work on preparation for hearing; researched Equal Protection Clause cases.	1.60
04/08/15	LMK	Analysis of briefs in preparation for upcoming hearing.	0.50
04/10/15	CRW	Correspondence with client regarding upcoming hearing.	0.20
04/13/15	CRW	Analyzed 1983 issues for upcoming hearing.	0.40
04/13/15	CRW	Reviewed Eleventh Amendment case law.	0.90
04/13/15	JRP	Research and analyze cases regarding constitutional scrutiny of classifications based on alienage and review Second Amendment cases raising similar issues.	1.00

DATE	ATTY	DESCRIPTION	HOURS
04/14/15	CRW	Continued preparation for hearing on Motion for Preliminary Injunction.	0.40
04/15/15	CRW	Continued preparation for hearing.	0.30
04/16/15	CRW	Completed preparation for hearing; attended hearing/argued motion.	3.00
04/17/15	CRW	Worked on legal theory for Sheriff being a "person" under 1983 based upon enforcement of CHP statute.	0.80
04/17/15	CRW	Correspondence with client regarding permit application process.	0.20
04/20/15	CRW	Reviewed correspondence from client and follow up regarding same.	0.50
04/23/15	CRW	Telephone conference with client.	0.20
04/24/15	CRW	Reviewed proposed legislation in light of State's argument on Motion for Preliminary injunction.	0.40
04/24/15	CRW	Correspondence with client regarding permit application process in light of potential ruling.	0.20
04/24/15	CRW	Read Order on Preliminary Injunction.	0.30
04/24/15	CRW	Telephone call to opposing counsel and follow up regarding same.	0.20
04/25/15	CRW	Additional correspondence with client and follow up regarding enforcement of order.	0.40
04/26/15	CRW	Correspondence regarding extension of time and issues related to Motion to Dismiss.	0.30
04/27/15	CRW	Correspondence with and telephone conference with client as follow up to ruling on Motion for Preliminary Injunction.	0.80
04/27/15	CRW	Attention to extension of time.	0.20
04/28/15	CRW	Correspondence with opposing counsel and follow up on motion for extension of time.	0.40
04/29/15	CRW	Telephone calls to/from K. Messmer regarding application process; telephone call to D. Erteschik; additional follow up.	1.20
05/01/15	CRW	Email from and telephone call to client regarding application process.	0.20
05/01/15	CRW	Analyzed/researched issues for response briefs.	1.00
05/04/15	CRW	Correspondence with client.	0.20
05/04/15	CRW	Review correspondence with D. Erteschik and follow up regarding same; telephone call with D. Sigale.	0.60
05/06/15	CRW	Correspondence with opposing counsel regarding motion responses.	0.10
05/06/15	CRW	Revised/finalized motions to extend time.	0.20
05/07/15	CRW	Reviewed correspondence from opposing counsel regarding proposed motion, and follow up regarding same.	0.20
05/08/15	CRW	Reviewed correspondence from opposing counsel and follow up regarding same.	0.40
05/11/15	CRW	Worked on structure of argument for response to State's brief.	0.30

DATE	ATTY	DESCRIPTION	HOURS
05/11/15	LMK	Analysis of motion to amend order.	0.10
05/14/15	CRW	Reviewed amended order and follow up with client regarding same.	0.30
05/18/15	CRW	Reviewed case authority cited in State defendants' brief and worked on Second Amendment argument.	2.20
05/18/15	JRP	Research and analyze issue of whether state defendants Governor, Attorney General, and Secretary of Public Safety are proper parties to action.	0.30
05/18/15	ECS	Confer with C. Webb regarding response deadlines and strategy relating to the same.	0.20
05/18/15	LMK	Prepare draft responses in opposition to Motion to Dismiss.	1.70
05/19/15	CRW	Revised Second Amendment/Equal Protection argument for response brief; reviewed and incorporated Eleventh Amendment argument; finalized brief; correspondence to client.	2.30
05/19/15	CRW	Reviewed/revised brief in response to Sheriff's motion.	0.50
05/19/15	JRP	Continue research on 11th Amendment issue and read relevant case law to develop argument for response to Motion to Dismiss and draft argument for brief.	1.00
05/19/15	ECS	Draft portions of Response in Opposition to Motion to Dismiss; Shepardize authority relating to the same.	1.10
05/19/15	LMK	Review and file responses in opposition to Motions to Dismiss.	0.40
05/19/15	CRW	Reviewed correspondence from client.	0.30
05/20/15	CRW	Correspondence with client.	0.20
05/21/15	CRW	Worked on filings and correspondence with opposing counsel.	0.50
05/22/15	CRW	Reviewed order regarding bond and follow up regarding same.	0.20
05/22/15	LMK	Prepare and file amended response in opposition to Motion to Dismiss.	0.70
05/25/15	CRW	Follow up regarding bond order.	0.20
05/26/15	LMK	Communicate and forward security bond to Clerk of Court.	0.50
06/08/15	CRW	Correspondence with client regarding status of permit and pending motions.	0.20
06/10/15	CRW	Worked on follow up items from call with opposing counsel.	0.20
06/11/15	CRW	Analyzed potential avenues for streamlining case / reaching a decision as a matter of law.	0.60
06/19/15	CRW	Correspondence with client regarding issuance of permit.	0.20
06/22/15	CRW	Reviewed correspondence from client regarding permit.	0.10
06/25/15	CRW	Correspondence with client regarding status of motions.	0.30
06/26/15	CRW	Telephone conference with D. Erteschik and follow up regarding same.	0.40

DATE	ATTY	DESCRIPTION	HOURS
07/08/15	CRW	Correspondence with client regarding permit renewal.	0.20
07/31/15	CRW	Read order in Veasey case and follow up correspondence to client.	0.20
08/03/15	CRW	Review text of and status of amendment to statutes regarding citizenship.	0.70
08/03/15	CRW	Correspondence with client and follow up regarding same.	0.30
08/04/15	CRW	Worked on issues regarding potential final judgment.	0.30
08/05/15	CRW	Received/reviewed Order on Motion to Dismiss and emailed client regarding same.	0.30
08/07/15	CRW	Follow up analysis of effect of amendment to NCGS 14-415.12.	0.60
08/07/15	CRW	Reviewed motions filings and planned response.	0.70
08/10/15	LMK	Prepare declaration of C. Webb in support of motion for attorneys fees; analysis of firearm laws.	1.50
08/10/15	CRW	Reviewed matters to be submitted to the court for fee motion and planned out filings.	1.10
08/10/15	CRW	Telephone conference with R. Zechini regarding legislative history of change in CHP statute, and follow up research regarding same.	0.30
08/10/15	CRW	Detailed review of time entries and expenses, and revisions to same, for exhibit to fee declaration.	0.70
08/10/15	CRW	Correspondence with client regarding case status, amendment of statute, and permit status.	0.20
08/11/15	LMK	Prepare motion for attorneys fees.	0.70
08/11/15	CRW	Outlined brief in support of Motion for Attorney Fees and drafted portion of legal standard section of brief.	0.60
08/11/15	CRW	Developed facts to present to the court in support of Motion for Attorneys Fees.	0.50
08/12/15	CRW	Analyzed potential responses to Motion to Dismiss (Mootness).	0.60
08/14/15	CRW	Received email from C. Blake regarding fee affidavit, worked on issues regarding affidavit, and composed/sent email to C. Blake.	0.20
08/17/15	CRW	Worked on potential affidavit from A. Gura.	0.20
08/18/15	LMK	Strategy session with C. Webb regarding brief for attorneys fees.	0.10
08/18/15	CRW	Reviewed Circuit case law regarding prevailing party under 1988 and revised portion of brief regarding same.	0.90
08/18/15	CRW	Correspondence to client regarding status of case and upcoming motion/motion response.	0.10
08/18/15	CRW	Conducted legal research and drafted response to Motion to Dismiss.	0.40
08/19/15	CRW	Reviewed correspondence from client.	0.10
08/20/15	CRW	Revised motion, brief, and declarations for motion for attorney fees.	0.60

DATE	ATTY	DESCRIPTION	HOURS
08/20/15	CRW	Finalized Response to Motion to Dismiss.	0.10
08/21/15	LMK	Cost analysis on attorney time entries.	0.70
08/22/15	CRW	Correspondence with client.	0.10
08/24/15	CRW	Revised brief and supporting declarations for Motion for Attorney's Fees, and conducted additional research regarding lodestar factors.	1.10
08/25/15	LMK	Analysis of time entries; communicate with K. Messmer regarding contents of declaration; prepare declaration	3.30
08/25/15	CRW	Revised Gura declaration and drafted Webb declaration.	0.60
08/25/15	CRW	Revised fact section of brief in support of Motion for Attorney's Fees, added text to argument section of brief, and revised entire brief.	0.50
08/25/15	CRW	Correspondence with C. Blake and drafted Blake Declaration.	0.40
08/25/15	CRW	Revised Messmer declaration.	0.20
		<u>TOTAL HOURS:</u>	79.10
		<u>TOTAL:</u>	<u>\$30,496.50</u>

COSTS

DESCRIPTION	AMOUNT
Courier Service 04/20/2015	\$24.77
Working Meals Camden Webb: Lunch with co-counsel David Sigale following motion hearing on 4/16/15	\$33.60
Filing fee Clerk, U.S. District Court: 5:15CV97 - Messmer v. Harrison, et al.	\$400.00
Filing Fee Clerk, U.S. District Court: Security Bond	\$1.00
Westlaw	\$94.00
Pacer	\$29.70
TOTAL COSTS	\$583.07
TOTAL	<u>\$31,079.57</u>